Motion GRANTED. Atte A. Mangr

## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and ) on Behalf of All Others Similarly Situated,	Civil Action No. 3:16-cv-02267
Plaintiff, ) vs.	Honorable Aleta A. Trauger
	PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL
CORRECTIONS CORPORATION OF AMERICA, et al.,	
Defendants. )	

Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund ("plaintiff"), by its undersigned counsel, hereby moves the Court for leave to file under seal an unredacted version of Exhibit 1 to Plaintiff's Opposition to Motion to Compel Disclosure of Identity of Plaintiff's Confidential Witness, which is being filed contemporaneously herewith as a "Sealed Document" pursuant to Administrative Order No. 167, §5.07.

The exhibit plaintiff proposes to file under seal was produced by defendants in discovery and designated "CONFIDENTIAL" under the Protective Order in this case (ECF No. 86). Pursuant to  $\P 10$ (b) and 12 of the Protective Order the document is required to be filed under seal. Defendants shall submit an affidavit in support of this item within seven days in support of the confidential designation. If no such affidavit is filed, the exhibit will automatically become part of the public record.

DATED: July 18, 2018

ROBBINS GELLER RUDMAN & DOWD LLP DENNIS J. HERMAN WILLOW E. RADCLIFFE KENNETH J. BLACK

> s/ Dennis J. Herman DENNIS J. HERMAN

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